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TRANSPORTATION  
COMMISSION

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## *Memorandum*

TO: Air Quality Conformity Task Force

DATE: October 14, 2005

FR: Ashley Nguyen

RE: Status of Future SIP Revisions

### **Background**

In early 2004, the Bay Area Air Quality Management District, MTC and ABAG began preparing the new Bay Area Ozone Strategy to cover federal and state ozone planning requirements. Modifications to the federal portion of the Ozone Strategy provided an opportunity to insert new elements and to modify some existing SIP requirements. At that time, MTC proposed to amend the TCM Substitution Procedures and Interagency Consultation Procedures into the SIP. These procedures were drafted by MTC and reviewed on multiple occasions by the Conformity Task Force.

MTC's Planning and Operations Committee (POC) subsequently approved the TCM Substitution Procedures on July 9, 2004. MTC action on the Interagency Consultation Procedures is on hold pending additional consultation with EPA. Likewise, EPA's new Phase 2 conformity regulations for the 8-hour ozone standard, yet to be issued, could affect the way MTC determines conformity of the TIP and Regional Transportation Plan.

### **Review Requested**

MTC intends to advance all the SIP revisions mentioned above at the same time for a more efficient public review process. The timing will likely be after the Air District completes the update of the state Bay Area 2005 Ozone Strategy. The key timing element is the release of EPA's new 8-hour conformity regulation, which will determine the extent of changes to the Bay Area's current conformity procedures. EPA has expressed a desire to review both the Interagency Consultation procedures and the new conformity requirements at the same time and then provide these comments to MTC. MTC could then proceed with the local process for reviewing the proposed SIP revisions and revising Resolution 3075, which contains the Bay Area's conformity procedures. MTC seeks comments from the Task Force on this proposed process.